9.0 ALTERNATIVES

Section 15126.6(a) of the *CEQA Guidelines* states that "*an EIR shall describe a range of reasonable alternative to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives*." The EIR is to consider a "reasonable range" of alternatives to foster informed decision-making and public participation.

CEQA requires the City to identify feasible alternatives that will avoid, or at least lessen, significant impacts associated with the project. CEQA defines "feasible" in the statute (PRC 21061.1) and in the CEQA Guidelines as follows:

> *" 'Feasible' means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental legal, social and technological factors."*

The City must determine what represents a feasible alternative, taking into account factors such as legal, housing, and social constraints as well as costs and engineering feasibility with available information. EIR's are only required to include analysis of alternatives that are "potentially" feasible and meet the overall project objectives. It is the public agency (Planning Commission), not an EIR, that bears the responsibility for making definitive findings as to whether specific economic, legal, housing, social, technological, or other considerations make infeasible or feasible the "potentially feasible mitigation measures or alternatives identified in an EIR. A decision-making body can, therefore, support a finding of infeasibility or feasibility (particularly with respect to economic, social and housing factors) with information outside the EIR, so long as such information appears somewhere in the administrative record. This EIR focuses on potential feasibility of mitigation measures and alternatives of the Valle Verde project with respect to technological and environmental factors. However, this EIR does not make any final determinations on the feasibility of alternatives presented, particularly with respect to economic, social and housing factors that need to be considered in any final analysis of feasibility. These factors will be considered by the Planning Commission during their comprehensive review of the proposed project at public hearings following completion of the Final EIR.

The City must also evaluate how an alternative may affect meeting the overall project objectives. An alternative cannot be dismissed simply because it prevents the project objective from being fully realized, nor can an alternative be rejected because it would not achieve all of the project objectives. As described in Section 3.6, the primary objectives of the Valle Verde project include:

1. Enhance facilities provided on the campus site.

2. Meet a portion of Santa Barbara's need for senior housing.

Other objectives of the proposed project also include:

3. Maintain the balance of outdoor campus space for pedestrian activities and enhance the aesthetics of new development.

4. Maintain single-story architecture for housing and amenities to best serve the physical and independent needs of the residents.

5. Continue to be a good neighbor by maintaining neighborhood compatibility.

6. Implement best management practices campus-wide.

9.1 ALTERNATIVES TO BE EVALUATED

Five alternatives to the Valle Verde project have been evaluated in this EIR:

- **No Project – No Development.** The "No Development" scenario assumes that no new construction occurs on the project site. Under this alternative, no new residences would be provided, no changes to existing facilities would occur, and the project site remains in its current condition.

- **No Project – Existing CUP Buildout.** Under this alternative, 40 additional independent living units, similar to the number of new units that would be provided by the proposed project, would be provided on the project site. The 40 new units, however, would be developed by making interior modifications to residential buildings that presently exist on the project site. A total of 253 independent living units would be provided by this alternative, which would not exceed the 254 units allowed on the project site by a CUP (as amended) that was approved in 1984. The proposed project would provide a total of 251 independent living units.

- **Reduced Biological Resource Impacts – Eliminate the Proposed Driveway Connection to Torino Drive.** The objective of this alternative is to minimize impacts to oak trees and other biological resources located on the Rutherford parcel portion of the project site. This would be accomplished by eliminating a proposed driveway (Mesa Verde) that would connect to Torino Drive. The alternative access to proposed units on the Rutherford parcel would be provided by using an existing private street that connects with Torino Drive (Calle Sastre) and by reconstructing an existing driveway that extends westward from a location near the northern end of Calle Sastre.

- **Reduced Biological Resource Impacts – Relocate Proposed Residential Units on the Project Site.** The objective of this alternative is to minimize

impacts to biological resources located along the western border of the project site. Proposed units that would result in substantial impacts to important biological resources, including oak trees, oak woodland habitat, and coastal sage scrub habitat would be relocated to new locations on the previously developed portions of the Valle Verde campus.

- **Reduced Biological Resource Impacts – Reduced Fuel Management Zone Width.** The objective of this alternative is to minimize impacts to oak woodland and coastal sage scrub habitat located along the western border of the project site. This objective would be achieved by reducing the width of the proposed fuel management zone from 75 to 50 feet. Along with the reduced fuel management zone width, the project would implement various construction techniques required for structures located within or adjacent to high fire hazard zones.

9.2 ALTERNATIVES REJECTED FROM FURTHER CONSIDERATION

Several additional alternatives to the proposed project were considered but rejected from further analysis because the alternatives would not be feasible, or would not attain most of the basic objectives of the project.

Alternative Project Site. The alternative of developing new residential units at an alternative site was determined to not be feasible because the cost of obtaining a parcel large enough to accommodate 40 single-story residential units would likely preclude implementation of the project. In addition, an alternative project site would not implement the project objective of enhancing existing facilities provided on the Valle Verde campus.

Reduced Number of Residential Units on the Project Site. The analysis of project-related environmental impacts provided in EIR Section 5.0 (Environmental Impacts and Mitigation Measures) and Section 7.0 (Impacts Found not to be Significant) determined that proposed mitigation measures would feasibly reduce the significant aesthetic and biological resource impacts of the proposed project to a less than significant level. The EIR analysis also concluded that the proposed project would not result in significant traffic-related impacts, therefore, no mitigation measures are required for this issue area.

CEQA Guidelines section 15041(c) requires that "*…a Lead or Responsible Agency shall not reduce the proposed number of housing units as a mitigation measure or alternative to lessen a particular significant effect on the environment if that agency determines that there is a another feasible, specific mitigation measure or alternative that would provide a comparable lessening or the significant effect.*" Since all of the proposed project's environmental impacts can be feasibly reduced to a less than significant level with the implementation of proposed mitigation measures, CEQA

specifically precludes the evaluation of an alternative that would reduce the number of units included in the proposed project.

Project Redesign – Provide Two-Story Units. This alternative was rejected from further evaluation because providing residential units with two stories and stairs would not be "age appropriate" for the retired adult residents of the proposed units. Adding elevators to individual buildings would be cost-prohibitive, and combining units into larger structures with shared elevators would result in the development of structures that would be out of scale with the size and proportions of the existing residences provided on the Valle Verde campus. A design option that resulted in the development of two-story residences would also conflict with the project objective to maintain single-story architecture on the project site.

Project Redesign – No Zoning Modifications. This type of alternative was rejected from further consideration because the requested zoning modifications (building setback and separation standards) would not result in significant environmental impacts.

Reduced Traffic Impacts. The analysis of traffic-related impacts provided in EIR Section 5.3 determined that the proposed project would not result in significant traffic generation, parking or safety-related impacts. Therefore, alternatives with an overall objective of minimizing traffic-related impacts (e.g., reduce the number of proposed units, eliminate other project components that would generate traffic) were rejected from further consideration.

Reduced Aesthetic Impacts. The analysis of aesthetic-related impacts provided in EIR Section 5.1 determined that the only project-related aesthetic impact would result from the removal of specimen/skyline trees located on the project site, and that impact can be reduced to a less than significant level by implementing a mitigation measure identified by the Initial Study prepared for the Valle Verde project. Alternatives to minimize impacts to mature trees are considered in conjunction with the Reduced Biological Resource Impacts alternatives described in Section 9.1. Therefore, additional alternatives with an overall objective of reducing impacts to visual resources were rejected from further consideration.

9.3 NO PROJECT ALTERNATIVES

CEQA Guidelines section 15126.6(e) requires that an EIR evaluate a "No Project" alternative. The purpose of this alternative is to "*allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.*" Two "No Project" Alternative scenarios are presented below.

9.3.1 No Project Alternative – No Development

Under the "No Development" scenario, no new uses would be established at the project site and existing campus facilities would remain in their current condition. This alternative would:

- Avoid significant but mitigable aesthetic and biologic impacts resulting from the removal of oak trees and other specimen/skyline trees.
- Avoid significant but mitigable impacts to oak woodlands and coastal sage scrub, and less than significant impacts to non-native grassland.
- Avoid significant but mitigable impacts to nesting birds and sensitive reptile species, including silvery legless lizards and coast horned lizards, which have the potential to be located on the project site.
- Avoid significant but mitigable impacts to two sensitive plant species (Santa Barbara honeysuckle and mesa horkelia) that have the potential to be located on the project site.
- Avoid the proposed project's less than significant traffic-related impacts.
- Avoid the proposed project's significant but mitigable impacts related to geological hazards, wildfire, construction noise and short-term solid waste disposal.

The "No Development" scenario would avoid all of the impacts of the proposed project. However, implementation of the "No Development" scenario is not required to avoid the significant impacts of the proposed project because all identified impacts can be reduced to a less than significant level with the implementation of proposed mitigation measures. In addition, the project-related benefit of providing housing for retired adults would not occur if this No Project scenario was to be implemented.

9.3.2 No Project Alternative – Existing CUP Buildout

Introduction

A CUP was approved in 1984 for the Valle Verde facility that allowed the construction of a 28-unit apartment complex and other facilities located on the project site. With the approval of the CUP, the Valle Verde facility was permitted to provide a total of 254 independent living units. Since 1993, a number of changes have been approved for the Valle Verde campus through the City's Substantial Conformance Determination process. Changes to the campus have included adding bathrooms to existing units; converting existing units to other uses such as a wellness clinic and archive

storage; and combining small independent living units into a single unit. Over time, these changes have decreased the number of independent units provided on the project site from 254 to 213.

Under this No Project scenario, 40 independent living units would be provided on the project site, similar to the number of new units that would be provided by the proposed project. However, the 40 new units would be created by reconverting single units back into two smaller units. This conversion would be accomplished by making only interior modifications to existing residential buildings, and no expansion of any building footprint would be required. If this alternative were to be implemented, a total of 253 independent living units would be provided on the Valle Verde campus, which would not exceed the 254 units that were previously approved by the 1984 CUP. Only a building permit would be required to implement this alternative, and no discretionary approvals from the City would be needed. Under this alternative, other components of the proposed project, such as the additional Assisted Living facility beds, demolition of the Rutherford house, and other campus-wide improvements, would not be implemented.

Alternative Analysis

Aesthetics. The No Project-CUP Buildout Alternative would only result in interior changes to existing residential structures to provide 40 additional dwelling units on the previously developed portions of the Valle Verde campus. No new buildings, parking areas, changes to other existing buildings, or other alterations to the project site would occur under this alternative. Specifically, no new development would occur on the Rutherford parcel, which would remain in a mostly undeveloped condition.

This alternative would avoid the significant but mitigable impacts of the proposed project resulting from the removal of individual oak trees and other specimen/skyline trees located on the project site. The CUP Buildout Alternative would also avoid the less than significant impacts to views provided from Calle de los Amigos and Torino Drive that would result from the implementation of the proposed project.

Biological Resources. The No Project- CUP Buildout Alternative would result in interior changes to existing residential structures and no exterior changes to the project site would occur. This alternative would avoid all of the significant but mitigable impacts to biological resources that would result from the proposed project, including impacts to individual oak trees, oak woodland and coastal sage scrub habitat, nesting birds and sensitive reptile species, and sensitive plants that have the potential to be located on the project site.

Transportation/Circulation. This section summarizes the traffic impact analysis of the CUP Buildout Alternative that is provided by the traffic report prepared for the proposed project (*Valle Verde Retirement Community EIR Traffic Impact Study*, Iteris, 2010). Please refer to EIR Appendix D to review the complete traffic report.

The analysis of traffic-related impacts that would result from the implementation of this alternative is based on the project area existing and future (2013) traffic conditions that were used for the analysis of the proposed project. The analysis of this alternative uses vehicle trip generation rates similar to those used for the evaluation of the independent living units that would be provided by the proposed project, and also uses similar trip distribution characteristics to assign vehicle trips onto project area roadways. Additional information regarding existing traffic conditions, future traffic conditions, and project-related trip generation and distribution characteristics is provided in EIR Section 5.3.

Vehicle Trip Generation and Distribution. Using the same vehicle trip generation rate for the 40 reconstructed dwelling units that would be provided by this alternative as was used to evaluate the traffic impacts of the proposed project, it was determined that the CUP Buildout Alternative would generate 112 average daily trips, seven (7) a.m. peak hour trips and 12 p.m. peak hour trips. Trip generation characteristics of this alternative are summarized on Table 9.3-1, and trip distribution characteristics of the traffic generated by this alternative are depicted on Figure 9.3-1.

In comparison to the proposed project, which would generate 98 average daily trips, eight (8) a.m. peak hour trips and 12 p.m. peak hour trips, this alternative would generate 14 additional average daily trips and one (1) additional a.m. peak hour trip. There are several reasons for the increase in trip generation characteristics when comparing the proposed project and the CUP Buildout Alternative. As described below and depicted on Table 5.3-5 of EIR Section 5.3.3.3 the differences in trip generation characteristics between the proposed project and this alternative occur because:

- New uses that would be developed by the proposed project (40 dwelling units, four additional Assisted Living beds, and additional Bed and Breakfast rooms) would generate a total of 132 average daily trips, 10 a.m. peak hour trips and 16 p.m. peak hour trips.

- The proposed project would result in the removal of several existing uses from the project site, including the single-family dwelling on the Rutherford parcel, the Hospice facility, and six (6) independent living units. The removal of these uses would decrease the amount of traffic generated by the proposed Valle Verde project by 34 average daily trips, two (2) a.m. peak hour trips and four (4) p.m. peak hour trips.

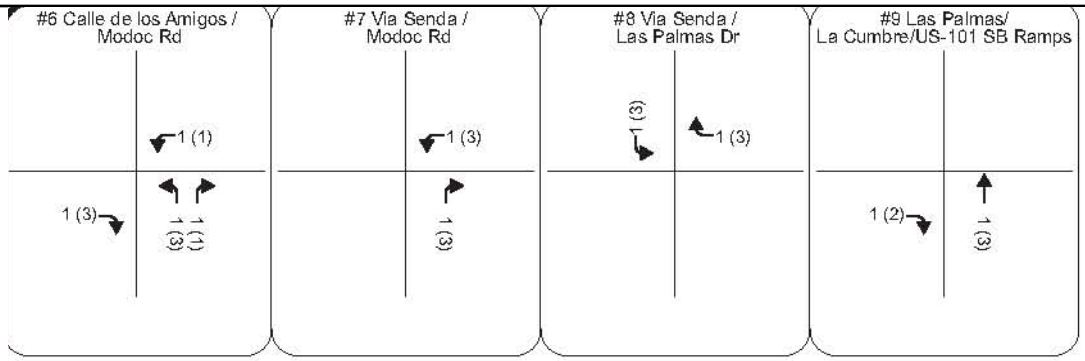
- After deducting removed trips from trips generated by proposed uses, a net increase of 98 average daily trips would occur.

CUP Buildout Project-Specific Traffic Impact Analysis. The traffic that would be generated by the CUP Buildout alternative was combined with the Future Without Project traffic volumes described in EIR Section 5.3.3.4. Combining the traffic volumes of both

Table 9.3-1
CUP Buildout Alternative Trip Generation Characteristics

Land Use	Units/ Type	Daily Trips						AM Peak Hour						PM Peak Hour					
		Rate	Trips	In		Out		Rate	Trips	In		Out		Rate	Trips	In		Out	
				Rate	Trips	Rate	Trips			Rate	Trips	Rate	Trips			Rate	Trips	Rate	Trips
Senior Adult Housing - Attached	40 d.u.	2.81	112	0.5	56	0.5	56	0.18	7	0.64	4	0.36	3	0.29	12	0.48	6	0.56	6

Source: Iteris, 2010



Legend

① - Study Intersection

XX(XX) - AM (PM) Peak Hour Volumes

NOT TO SCALE

Source: Iteris, 2010

City of Santa Barbara

Valle Verde Retirement Community
Project EIR

Figure 9.3-1

CUP Buildout Added Peak Hour Traffic Volumes

scenarios provides the peak-hour traffic volumes on local roadways that would result from the implementation of the CUP Buildout alternative (Future With CUP Buildout).

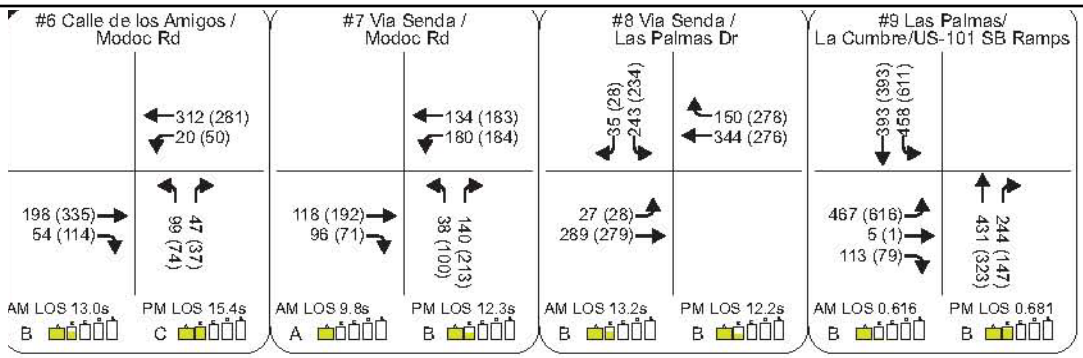
The Future With CUP Buildout traffic operating conditions were analyzed for the weekday AM and PM peak hours at each of the four intersections that were evaluated as part of the project-specific analysis. Figure 9.3-2 illustrates the Future With CUP Buildout Project Peak Hour Traffic Volumes at each of the four study intersections. The levels of service at the four intersections were calculated and are provided on Table 9.3-2. As shown by the table, intersection delays are expected to increase slightly with the addition of vehicle trips generated by the CUP Buildout Alternative. However, the small increase in intersection delays resulting from the implementation of this alternative does not result in a significant traffic impacts. The detailed level of service worksheets for the analyzed intersections are included in traffic report Appendix B (EIR Appendix D).

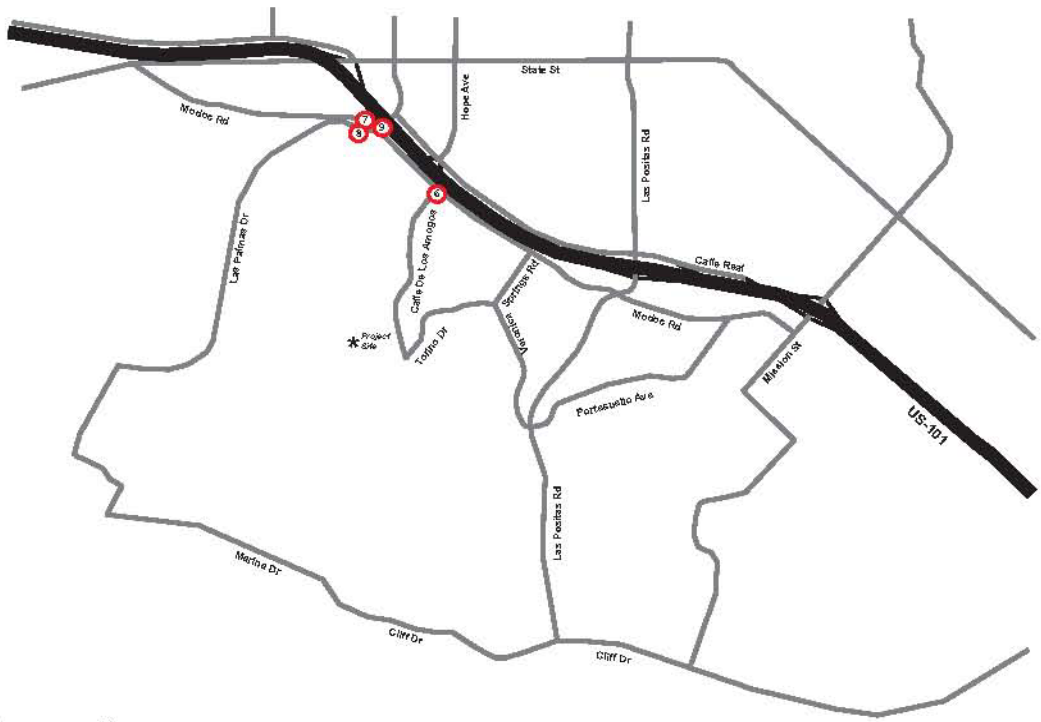
Table 9.3-2
LOS Analysis – Future With CUP Buildout Conditions

Intersection	Future Without Project Conditions				Future With CUP Buildout Conditions					
	Weekday AM Peak Hour		Weekday PM Peak Hour		Weekday AM Peak Hour			Weekday PM Peak Hour		
	LOS	V/C or Avg Delay	LOS	V/C or Avg Delay	LOS	V/C or Avg Delay	Δ V/C	LOS	V/C or Avg Delay	Δ V/C
Calle de los Amigos at Modoc Road[(a)]	B	12.9	C	15.2	B	13.0	0.1	C	15.4	0.2
Via Senda at Modoc Rd[(a)]	A	9.7	B	12.2	A	9.8	0.0	B	12.3	0.1
Via Senda at Las Palmas Dr[(a)]	B	13.2	B	12.2	B	13.2	0.0	B	12.2	0.0
S La Cumbre Rd at Route 101 SB Ramps	B	0.616	B	0.680	B	0.616	0.000	B	0.681	0.001

Note: [a] intersection controlled by stop sign; values represent average delay in seconds.
LOS = Level of Service, Delay = Average Vehicle Delay (Seconds)
V/C = Volume-to-Capacity Ratio for Signalized Intersections.
Source: Iteris, 2010

Proposed Project and CUP Buildout Alternative LOS Impact Analysis Comparison. This subsection provides a comparison of the traffic impacts that would result from the proposed project and the impacts of the CUP Buildout Alternative. The traffic impacts of both scenarios are presented on Table 9.3-3. The comparison of the traffic operation conditions resulting from the two scenarios indicates that although the CUP Buildout alternative would generate slightly more traffic than the proposed project, the proposed Project and the CUP Buildout alternative would have the same effect on V/C ratios and average delay at each of the study intersections. The similarities in traffic operation characteristics results from the very low overall amount of traffic that would be generated by the proposed project and this alternative.





Legend

① - Study Intersection

XX(XX) - AM (PM) Peak Hour Volumes

AM LOS 0.429
A
Peak Hr V/C or Del/Veh (seconds)
Level of Service (LOS)

- LOS A through D
- LOS E
- LOS F

NOT TO SCALE

Source: Iteris, 2010

City of Santa Barbara

Valle Verde Retirement Community
Project EIR

Figure 9.3-2

Future With CUP Buildout Peak Hour Traffic Volumes

Table 9.3-3
Intersection Capacity Analysis Comparison – Proposed Project and the CUP Buildout Alternative

Intersection	Weekday AM Peak Hour			
	Proposed Project		CUP Buildout	
	V/C	Avg. Delay (sec)	V/C	Avg. Delay (sec)
Calle de los Amigos at Modoc Road[(a)]	-	13.0	-	13.0
Via Senda at Modoc Rd[(a)]	-	9.8	-	9.8
Via Senda at Las Palmas Dr[(a)]	-	13.2	-	13.2
S La Cumbre Rd at Route 101 SB Ramps	0.616	26.2	0.616	26.2

Intersection	Weekday PM Peak Hour			
	Proposed Project		CUP Buildout	
	V/C	Avg. Delay (sec)	V/C	Avg. Delay (sec)
Calle de los Amigos at Modoc Road[(a)]	-	15.4	-	15.4
Via Senda at Modoc Rd[(a)]	-	12.3	-	12.3
Via Senda at Las Palmas Dr[(a)]	-	12.2	-	12.2
S La Cumbre Rd at Route 101 SB Ramps	0.681	27.5	0.681	27.5

Note: [a] intersection controlled by stop sign; values represent average delay in seconds.
ICU = Intersection Capacity Utilization, HCM = Highway Capacity Manual, LOS = Level of Service, Avg. Delay = Average Vehicle Delay (Seconds), V/C = Volume-to-Capacity Ratio
ICU results are shown of signalized intersections, while HCM results are shown for stop sign controlled intersections.
Source: Iteris, 2010

CUP Buildout Cumulative Traffic Impact Analysis. The analysis of cumulative traffic impacts that would result from the implementation of the CUP Buildout alternative is based on the existing and future (2013) project area traffic conditions that were used for the analysis of cumulative impacts that would result from the proposed project, along with similar projections related to cumulative development projects in the project area and the traffic generation characteristics of those projects. Additional information regarding the cumulative traffic impact analysis methodology is provided in EIR Section 5.3.4. The cumulative traffic impacts resulting from the CUP Buildout alternative are provided on Table 9.3-4. When compared to the cumulative traffic impacts of the proposed project (EIR Table 5.3-10) it can be seen that the cumulative traffic impacts of this alternative would be the same as the cumulative impacts of the proposed the project.

Table 9.3-4
LOS Analysis – Cumulative Project Conditions With CUP Buildout

Intersection	Future With CUP Conditions				Cumulative Project Conditions			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	LOS	V/C or Avg Delay	LOS	V/C or Avg Delay	LOS	V/C or Avg Delay	LOS	V/C or Avg Delay
Calle de los Amigos at Modoc Road[(a)]	B	13.0	C	15.4	B	13.6	C	16.2
Via Senda at Modoc Rd[(a)]	A	9.8	B	12.3	B	10.0	B	12.8
Via Senda at Las Palmas Dr[(a)]	B	13.2	B	12.2	B	13.6	B	12.5
S La Cumbre Rd at Route 101 SB Ramps	B	0.616	B	0.681	B	0.617	B	0.693

Note: [a] intersection controlled by stop sign; values represent average delay in seconds.
LOS = Level of Service, Delay = Average Vehicle Delay (Seconds)
V/C = Volume-to-Capacity Ratio for Signalized Intersections.
Source: Iternis, 2010

Parking. Implementation of the Existing CUP Buildout alternative would not provide any additional parking spaces on the Valle Verde project site, and the 331 parking spaces presently provided on the project site would be retained in their current configuration. Under this alternative, 253 independent living units and 331 parking spaces would be provided, which would exceed the requirements of the Zoning Ordinance parking standard for senior housing of one parking space for each residential unit. This alternative would comply with the City's parking requirements, however, the project-related benefit of providing additional on-site parking would not occur.

Other Environmental Issue Areas. No new structures would be developed under the CUP Buildout Alternative and no grading would occur on the project site. Therefore, significant but mitigable geologic hazard, short-term construction noise, and potential wildfire hazard impacts of the proposed project would be avoided. Extensive remodeling of existing units would generate a substantial amount of construction and demolition waste, therefore, short-term solid waste disposal impacts would be similar to the significant but mitigable impact of the proposed project.

9.4 REDUCED BIOLOGICAL RESOURCE IMPACTS – ELIMINATE THE PROPOSED DRIVEWAY CONNECTION TO TORINO DRIVE

Introduction

The objective of this alternative is to minimize impacts to oak trees and other biological resources located on the Rutherford parcel portion of the project site. This would be accomplished by eliminating the proposed driveway (Mesa Verde) that would connect to Torino Drive, and by providing access to the Rutherford parcel via an existing private street (Calle Sastre) that also connects with Torino Drive.

The proposed driveway segment that would be eliminated by this alternative would begin at Torino Drive, have a width of approximately 20 feet, and would extend northward approximately 90 feet to a location that would be used for the construction of a seven-car parking lot. The development of the proposed driveway would require the removal of four oak trees that have six- seven-, seven- and 16-inch diameter trunks. The proposed driveway would also have the potential to impact one oak tree that has a 28-inch trunk, and would result in the removal of approximately 1,800 square feet of non-native grassland habitat.

Under the relocated driveway alternative, access to the units proposed for the Rutherford parcel would still be provided from Torino Drive, however, vehicles would enter/exit the project site along Calle Sastre, which is located approximately 450 feet east of the proposed Mesa Verde driveway location. Near the northern end of Calle Sastre, the alignment of an existing driveway would be used to provide access to the Rutherford parcel. The existing driveway extends westward approximately 250 feet up a slope that has a gradient between 10 and 20 percent. The width of the existing driveway varies but it is approximately 10 to 12 feet wide, and the driveway terminates near the location of the existing Rutherford parcel residence.

This existing driveway would be improved as part of the proposed project to be used as a secondary driveway by Valle Verde staff to access the residences developed on the Rutherford parcel with small golf cart-type vehicles. As proposed, the reconfigured driveway would have a width of approximately 10 feet, would have a gradient that varies between two and 15 percent, and a retaining wall approximately 190 feet in length and with a maximum height of seven feet would be provided along the northern side of the roadway. For this alternative, it was assumed that to provide primary access to the Rutherford parcel units, consistent with Fire Department access regulations, the existing driveway would need to be reconstructed to provide a width of approximately 20 feet, similar to the width of the proposed Mesa Verde driveway.

Alternative Analysis

Aesthetics. As described below in the evaluation of impacts to biological resources, the driveway that would be developed under this alternative would require the removal of one oak tree; could result in the removal of one additional oak tree; and would have the potential to impact seven oak trees. The proposed Mesa Verde driveway would result in the removal of four oak trees and would impact one additional oak tree. Both the proposed project and the relocated driveway alternative would result in significant impacts to oak trees and the overall tree removal-related aesthetic impacts of the proposed project and this alternative would generally be similar.

Additional grading would be required to widen the existing driveway to a width of 20 feet. This grading would require the installation of additional retaining walls along the northern (uphill) edge of the driveway. Depending upon the height of the retaining walls, it is possible that they would be visible from view points along Torino Drive. Views of large retaining walls would have the potential to result in less than significant aesthetic impacts that are greater than the impacts of the proposed project.

Biological Resources. A tree survey and impact assessment was prepared for the proposed project (Spiewak, 2008). The tree survey determined the proposed Mesa Verde driveway would require the removal of tree numbers 34, 35, 36 and 37, which have trunk diameters of six-, seven-, seven- and 16-inches, respectively. The tree survey also identified impacts to trees that would result from project-related improvements to the existing Rutherford parcel driveway that would be used to provide secondary access. The proposed project's impacts to trees located along the existing driveway are summarized below.

Based on the results of the proposed project's tree survey and reasonable assumptions regarding grading that would be required to widen the existing on-site driveway that extends between Calle Sastre and the Rutherford parcel, an evaluation of potential oak tree impacts resulting from this alternative was conducted. Provided below is a comparison of the oak tree impacts that would result from project-related driveway alterations and the impacts of the relocated driveway alternative.

- Under the relocated driveway alternative, tree Nos. 22 and 45, which have trunk diameters of 18 and 10 inches, would be impacted due to root zone encroachment. These trees would also be impacted by the proposed project, however, it is likely that impacts to the trees would be increased by this alternative because additional grading along the driveway route would be required.

- This alternative would require that tree No. 24 (10 inches in diameter) be removed. This tree would be impacted (root zone encroachment) by the proposed project.

- Tree No. 175 would likely require removal under this alternative. This tree would be impacted (root zone encroachment) by the proposed project.

- A cluster of five trees is located near the south side of the existing driveway (tree Nos. 28, 29, 30, 31 and 32). Of these trees, No. 32 (20-inches in diameter) would be impacted by the proposed project. Impacts to the other trees would be avoided by implementing the requirements of the proposed tree protection plan. Under this alternative, it is likely that grading required for the driveway would result in increased impacts to the entire cluster of trees.

The proposed Mesa Verde driveway access to the Rutherford parcel would require the removal of four oak trees and would result in impacts to one additional oak tree. The proposed secondary access driveway alignment would impact five additional trees. Access to the Rutherford parcel that would be provided by this alternative would likely result in the removal of two oak trees and impacts to seven oak trees. Overall, the impacts to oak trees that would result from the implementation of the proposed project and the driveway replacement alternative would generally be similar.

The proposed Mesa Verde driveway would result in the removal of approximately 1,800 square feet of non-native grassland. Widening the existing driveway that extends between Calle Sastre and the Rutherford parcel for this alternative would also result in the removal of adjacent grassland habitat. Widening the driveway approximately 10 feet over its entire 250-foot length would result in the permanent removal of approximately 2,500 square feet of non-native grassland. Similar to the proposed project, the removal of the additional non-native grassland would not result in a significant impact, but the overall impact of this alternative would be incrementally increased when compared to the impact of the proposed project.

Transportation/Circulation. The driveway relocation alternative would not alter the number of trips generated by the proposed project and would not affect the distribution of traffic onto roadways in the project area. Therefore, the traffic-related impacts of this alternative would be the same as the impacts of the proposed project.

Other Environmental Issue Areas. The driveway relocation alternative would result in more grading than would be required to implement the proposed project. It is expected that grading-related erosion impacts of this alternative could be reduced to a less than significant level, similar to the impacts of the proposed project. This alternative would not increase or decrease the potential for wildfire to affect the project site, however, under this alternative only one driveway would be provided to serve the residences located on the Rutherford parcel. The absence of a secondary access to serve those residences would have the potential to increase wildfire safety impacts on the project site. Increased grading required to implement this alternative would incrementally increase short-term construction noise when compared to the proposed project. This impact, however, could be reduced to a less than significant level with the

implementation of mitigation measures similar to those required for the proposed project. This alternative would not substantially affect the amount of construction and demolition waste generated by the proposed project.

9.5 REDUCED BIOLOGICAL RESOURCES IMPACTS – RELOCATE PROPOSED UNITS ON THE PROJECT SITE

Introduction

The objective of this alternative is to minimize impacts to biological resources located along the western border of the project site. Proposed residential units that would result in substantial impacts to important biological resources, including oak trees, oak woodland habitat, and coastal sage scrub habitat would be relocated to new locations on the previously developed portions of the project site.

The proposed project would result in the development of five duplex units on the Rutherford parcel (units 6-7, 8-9, 10-11, 12-13 and 14-15); a duplex (units 16-17) and a single family structure (unit 18) adjacent to the northeast corner of the Rutherford parcel; and four single-family units on the west area of the project site (units 31, 32, 33 and 34). Impacts to biological resources that would result from the development of these proposed units are depicted on Figure 5.2-1 and are summarized below.

- **Units 6-7**. The development of these units, along with the adjacent Mesa Verde driveway, would result in the removal of four oak trees. These trees were identified as trees 34, 35, 36 and 37 on the tree survey prepared for the proposed project (Spiewak, 2009).

- **Units 8-9.** The development and maintenance of these units would not result in substantial impacts to individual oak trees, oak woodland of coastal sage scrub habitat.

- **Units 10-11.** These units would impact one oak tree (tree 32) and fuel management activities in the vicinity of the units would impact a very small area of oak woodland and coastal sage scrub habitat.

- **Units 12-13.** Fuel management activities for these units would impact an area of oak woodland and coastal sage scrub habitat.

- **Units 14-15.** The development of these units would result in the removal of one oak tree (tree 23), would impact two other oak trees (trees 22 and 24), and fuel management activities for the units would impact a small area of coastal sage scrub habitat.

- **Units 16-17.** Fuel management activities for this duplex structure would impact oak woodland and coastal sage scrub habitat.

- **Unit 18.** Fuel management activities for this unit would impact oak woodland and coastal sage scrub habitat.

- **Units 31, 32, 33 and 34.** The development of these units would result in the removal of five small oak trees (trees 167, 168, 169, 171, and 174), and fuel management activities for the units would impact areas with oak woodland and coastal sage scrub habitat.

As proposed, the units identified above would result in the removal of ten oak trees, result in impacts to three oak trees, and result in direct and indirect impacts to approximately 8,800 square feet of oak woodland and 5,000 square feet of coastal sage scrub habitat.

The specific units/structures to be relocated under this alternative may vary, however, the units that result in the most substantial impacts would be considered for relocation. Units that do not result in substantial impacts could be left in their current location and if necessary, the proposed design/location of the units could be adjusted slightly to provide increased setbacks from oak trees and/or habitat area to further minimize impacts. Any impacts to biological resources resulting from units that are not relocated would require the implementation of mitigation measures similar to those identified for the proposed project, which would reduce any remaining impacts to a less than significant level.

This analysis has assumed that units 6-7, 12-13, 16-17, 18, 31, 32, 33 and 34 would be relocated to other locations on the project site that do not contain important biological resources. The relocated units could be placed on open areas provided on the previously developed portions of the Valle Verde campus. The relocation of units could also be accomplished by "redeveloping" selected areas of the campus. This would likely entail the demolition of existing buildings and redesigning/constructing new and replacement units in the "redevelopment area" in a more efficient manner.

Alternative Analysis

Aesthetics. This alternative would remove three duplex structures from the western perimeter of the project site, and those units would be relocated to previously developed areas of the Valle Verde campus. The duplex units that would be relocated under this alternative would include the units 6 and 7, which are located closest to Torino Drive; units 12 and 13, which would be the only structure located west of the proposed Mesa Verde access driveway. The relocation of these two structures would decrease the less than significant project-related impacts that would result from the development of new structures on the open space area provided on the Rutherford property. This alternative would also result in the relocation of duplex units 16-17, which are proposed to be located near the northeast corner of the Rutherford parcel.

This alternative would also result in the relocation of proposed single-family units 18, 31, 32, 33 and 34. With the implementation of the proposed project, these units would not be visible from prominent public view points along Calle de los Amigos or Torino Drive. Depending on the relocation sites for these units under this alternative, the visibility of the relocated units as seen from prominent public view points could be increased.

Views of the relocated structures as seen from prominent public view points would not be expected to result in significant aesthetic impacts because the relocated units would be single-story structures that would not substantially interfere with important public scenic views, and the appearance of the structures would be consistent with other development on the Valle Verde campus. It is also possible that the sites used for the relocation of the units identified above could require the removal of mature trees. Similar to the proposed project, however, impacts of this alternative that may result from the removal of specimen/skyline trees could be reduced to a less than significant level by planting replacement trees. Overall, the aesthetic impacts of this alternative would be somewhat reduced when compared to the less than significant impacts of the proposed project because the alternative would minimize new development on the open space area provided on the Rutherford parcel.

Biological Resources. Under this alternative, proposed units 6-7, 12-13, 16-17, 18, 31, 32, 33 and 34 would be relocated to other locations on the project site that do not contain important biological resources. A description of the biological resource impacts that would be avoided or minimized by this alternative is provided below.

- **Units 6-7**. If this duplex structure were to be relocated, it is likely that the proposed Mesa Verde driveway could be realigned, which may avoid the need to remove four oak trees located along the proposed driveway alignment.

- **Units 12-13.** Relocation of this duplex structure would avoid or substantially reduce impacts to oak woodland and coastal sage scrub habitat that would result from required fuel management activities.

- **Units 16-17.** Relocation of this duplex structure would avoid or substantially reduce impacts to oak woodland and coastal sage scrub habitat that would result from required fuel management activities.

- **Unit 18.** Relocation of this structure would avoid or substantially reduce impacts to oak woodland and coastal sage scrub habitat that would result from required fuel management activities.

- **Units 31, 32, 33 and 34.** Relocation of these units would avoid the removal of five small oak trees and eliminate fuel management-related impacts to areas with oak woodland and coastal sage scrub habitat.

The relocation of the units listed above would incrementally reduce the potential for the project to result in significant but mitigable impacts to two sensitive plant species (Santa Barbara honeysuckle and mesa horkelia) that have the potential to be located on the western side of the project site. The units to be relocated would most likely be placed in areas that have been previously been developed, however, it is possible that mature trees would need to be removed from the proposed relocation sites. Similar to the proposed project, impacts of this alternative that may result from the removal of specimen/skyline trees could be reduced to a less than significant level by planting replacement trees. Proposed relocation sites would also need to be selected to avoid or minimize the potential for indirect impacts to riparian habitat that exists adjacent to portions of the project site, such as at the southeast corner of the Valle Verde campus.

Under this alternative, proposed units 8-9, 10-11 and 14-15 would be developed at or near their proposed locations. The development of these units at the proposed locations would have the potential to result in the removal of one oak tree, and impacts to three oak trees. A very small area of coastal sage scrub and oak woodland habitat area could still be impacted by required fuel management activities. These impacts could be reduced to a less than significant level by implementing mitigation measures similar to those identified for the proposed project.

In conclusion, the impacts to biological resources that would result from this alternative would be reduced when compared to the proposed project. The proposed project would result in the removal of 10 oak trees from the western portion of the project site and would also result in impacts to three additional trees. This alternative could require the removal of one oak tree and result in impacts to three other oak trees. This alternative would also reduce impacts to oak woodland and coastal sage scrub habitat resulting from required fuel management activities.

Transportation/Circulation. The dwelling unit relocation alternative would not increase or decrease the number of vehicle trips generated by the proposed project, and would not substantially affect the distribution of traffic onto roadways adjacent to the project site. Therefore, the traffic-related impacts of this alternative would be similar to the impacts of the proposed project.

Other Environmental Issue Areas. This alternative would incrementally reduce the amount of grading required to implement the project because the number of units located on the sloping areas of the western portion of the project site would be reduced. Project-related wildfire hazards would also be reduced somewhat by this alternative because there would be fewer units located in the urban-wildfire interface area that would be created along the western border of the project site. This alternative would reduce grading and construction activities on the western portion of the project site, which would incrementally reduce construction noise impacts to residences west of the site. Demolition of existing units to facilitate structure relocation could incrementally increase the project's short-term solid waste generation impacts. This impact would generally be similar to the impacts of the proposed project and would be reduced to a less than

significant level with the implementation of proposed mitigation measures to recycle construction and demolition waste.

9.6 REDUCED BIOLOGICAL RESOURCES IMPACTS – REDUCED FUEL MANAGEMENT ZONE WIDTH

Introduction

The proposed project would provide a fuel management zone that extends 75 feet from the edge of structures that would be located along the western perimeter of the project site. The purpose of the fuel management zone is to reduce vegetation density and fuel load to minimize the potential for wildfire-related impacts to proposed and existing structures located on and near the project site, and to provide "defensible space" around proposed structures that will facilitate fire suppression activities by the Fire Department in the event of a wildfire in the project area.

The objective of this alternative is to minimize impacts to oak woodland and coastal sage scrub habitat located along the western perimeter of the project site that would result from the implementation of the proposed fuel management plan. This objective would be achieved by implementing a Fire Department-approved fuel management plan that reduces the width of the fuel management zone from 75 feet to a width of 50 feet. The Fire Marshal would consider the approval of a reduced fuel management zone if building construction standards described below are also implemented.

The Fire Department is requiring a fuel management buffer due to the oak woodland/coastal sage vegetation that poses a fire hazard to the proposed structures based on 2007 CA Fire Code, Chapter 3, Section 304.1.2 (as adopted by Ordinance No. 5439). The fuel management area for Valle Verde is a modified fuel management area based on the area just south of Torino road that is considered "Coastal" High Fire Hazard" area.

- **Zone 1 – 0 to 30 Feet.** This area is closest to a structure. It provides the best protection against the high radiant heat that result during a wildfire. Plants should be low growing, irrigated plants. Focus should be on ground covers not more that 12 inches in height or succulents. Use non-flammable materials for paths, patios, and mulch. Trees should not be planted closer than 15 feet from a structure.

- **Zone 2 – 30 to 50 Feet.** Maintain a reasonably open character in this area. Plant low growing ground covers and succulents resistant to fire. Shrubs up to three feet can be planted but should have at least 18 feet spacing between other shrubs or other trees. Shrubs can be planted in clusters not more than 10 feet in diameter, but should have at least 18 feet between clusters. Do no plant shrubs underneath canopy of trees. Trees should be

spaced at least 30 feet apart to prevent crowns from touching once fully grown.

- **Zone 3 – 50 to 70 Feet.** This area should have native and Mediterranean plantings that require irrigation and should not be higher than four to six feet. Shrubs should be spaced at least 18 feet away from each other. Shrubs can be planted in clusters not more than 10 feet in diameter, but should have at least 18 feet between clusters. Trees should be spaced at least 30 feet apart to prevent crowns from touching once fully grown.

- **Zone 4 – 70 to 150 Feet.** This zone is furthest from the structure. Plantings once established need no irrigation. There is no limit to height. Shrubs planting in this area should have 18 feet spacing or be planted in clusters with at least 18 feet spacing. Trees should be spaced at least 30 feet apart to prevent crowns from touching once fully grown.

The proposed project would implement the fuel management activities described above for Zones 1, 2 and 3 (approximately 75 feet from proposed structures). Under this alternative, fuel management activities would occur only in Zones 1 and 2, and no fuel management activities in Zone 3 (50-70 feet from proposed structures) would occur. In addition to the reduced width of the fuel management area, structures along the western perimeter of the project site would be required to comply with Building Code Chapter 7a. This chapter of the Building Code provides building requirements for structures located in high fire hazard areas. In general, these requirements provide standards for exterior construction, roof covering, attic ventilation and standards for accessory buildings and structures.

Alternative Analysis

Aesthetics. Both the proposed project and this alternative would result in similar vegetation management activities adjacent to proposed structures in fuel management Zones 1 (0-30 feet) and 2 (30-50 feet). The proposed project would conduct vegetation management activities in Zone 3 (50-70 feet), however, under this alternative no fuel reduction activities would be conducted in the Zone 3 area. Therefore, under this alternative, the appearance of the Zone 3 area would not be modified by fuel management activities. The proposed project and associated fuel management activities in the Zone 3 area would modify existing visual conditions, however, proposed fuel reduction activities would not result in significant impacts to existing visual conditions. Therefore, the implementation of this alternative is not required reduce a project-related aesthetic impact to a less than significant level. Maintaining existing conditions in the Zone 3 area under this alternative could have the advantage of providing an increased landscape buffer between the proposed project development area and the adjoining Hidden Oaks neighborhood.

The high fire hazard building code standards that would be implemented under this alternative would not result in substantial changes to the appearance of the proposed structures. Therefore, the implementation of high fire hazard area building regulations would not result in a significant aesthetic impact. In conclusion, the implementation of this alternative and a reduction in proposed fuel management activities on the western portion of the project site would slightly reduce the less than significant aesthetic impacts that could result from project-related fuel modification activities in the Zone 3 area.

Biology. Both the proposed project and this alternative would result in similar vegetation management activities in fuel management Zones 1 (0-30 feet) and 2 (30-50 feet) on the western portion of the project site. However, no vegetation management would occur in the Zone 3 area (50-70 feet from proposed structures) under this alternative. The reduction in fuel management area would reduce but not avoid fuel management-related impacts to oak woodland and coastal sage scrub habitat. Since the Reduced Fuel Management Zone Width alternative would not relocate any proposed structures, this alternative would not eliminate or reduce project-related impacts to individual oak trees that are located on or adjacent to proposed building sites on the western portion of the project site. Habitat impact reductions that would result from the implementation of this alternative are described below.

- **Units 6-7, 8-9 and 10-11**. Due to the location of these proposed duplex structures, the proposed project's 75-foot fuel management zone would not result in significant fuel management impacts to oak woodland or coastal sage scrub habitat. Therefore, the implementation of this alternative would not reduce habitat impacts associated with these units.

- **Units 12-13.** Implementation of this alternative would reduce but not eliminate fuel management-related impacts to oak woodland habitat located to the north and west of the proposed building location. This alternative would also result in a small reduction in impacts to coastal sage scrub habitat located to the north of the proposed building.

- **Units 14-15.** This alternative would reduce fuel management-related impacts to an area of coastal sage scrub located to the north of this building.

- **Units 16-17.** This alternative would reduce but not avoid impacts to an area of coastal sage scrub and oak woodland habitat located west of the proposed building site.

- **Unit 18.** This alternative would reduce but not avoid impacts to an area of coastal sage scrub and oak woodland habitat located west of and adjacent to the proposed building site.

- **Unit 31.** This alternative would reduce but not avoid impacts to coastal sage scrub habitat located west of the proposed structure.

- **Units 32 and 33.** This alternative would reduce but not avoid impacts to oak woodland and coastal sage scrub habitat located to the west of the proposed structures.

- **Unit 34.** This alternative would reduce but not avoid impacts to coastal sage scrub habitat located west of the proposed structure. Impacts to a small area of coastal sage scrub and an area of oak woodland located to the north of the building would be avoided by this alternative.

As described in Section 5.2 of this EIR, fuel management activities that would be implemented by the proposed project would impact approximately 0.20 of an acre of oak woodland habitat and approximately 0.11 of an acre of coastal sage scrub habitat. As detailed above, this alternative would reduce the relatively small area impacted by the proposed project, but would not eliminate the project's fuel management-related habitat impacts. Additionally, this alternative would not avoid or reduce impacts to individual oak trees located on or adjacent to building sites located along the western edge of the proposed project site.

Transportation/Circulation. A reduction in the width of the proposed fuel management zone would not increase or decrease the number of vehicle trips generated by the proposed project, and would not substantially affect the distribution of traffic onto roadways adjacent to the project site. Therefore, the traffic-related impacts of this alternative would be similar to the impacts of the proposed project.

Other Environmental Issue Areas. The proposed project would provide a 75-foot wide fuel management zone, which slightly exceeds the upper end of the fuel management zone width (50-70 feet) recommended by Ordinance 5439 for properties located in the Coastal High Fire Hazard area. If accepted by the Fire Marshal, this alternative would reduce the project-related fuel management zone width to the minimum recommended distance of 50 feet. To compensate for the reduction in defensible space, proposed structures on the west side of the project site would be required to comply with high fire hazard zone building requirements.

Approval of a reduced fuel management zone width by the Fire Marshal would ensure that potential project-related wildfire impacts are reduced to a less than significant level. Therefore, the proposed project and this alternative would have similar less than significant fire suppression/wildfire-related impacts. The Reduced Fuel Management Zone Width Alternative, however, would result in a small reduction in fuel management activities on the Rutherford parcel, which is bordered by urban development to the east (the existing Valle Verde campus) and to the west (the Hidden Oaks residential neighborhood). This alternative would result in an incremental reduction in the overall fuel management benefits that would be provided by the proposed project, which would provide additional reduction of fuel loads in an area that is bordered by urban development.

9.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

This section summarizes the potential for each alternative evaluated by this EIR to avoid or minimize environmental impacts when compared to the impacts of the proposed project. Table 9.7-1 also provides a summary of the environmental impact characteristics of each evaluated alternative.

Under the "No Project Alternative – No Development" scenario, the project site would remain in its current condition and all of project-related environmental impacts would be avoided. Therefore, the "No Project – No Development" alternative is the environmentally superior alternative. However, this alternative would not attain the primary objectives of the proposed project. CEQA Guidelines Section 15126.6(e)(2) indicates that *"if the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."*

The "No Project – Existing CUP Buildout" alternative would limit project-related changes to the existing environmental conditions on the project site because only interior modifications to existing buildings would occur under this alternative. As a result, the proposed project's significant but mitigable aesthetic and biology impacts would be avoided. The traffic impacts of this alternative would be similar to the less than significant impacts of the proposed project, however, the alternative would result in a slight increase in the total amount of traffic generated when compared to the proposed project (an increase of 14 average daily trips and one p.m. peak hour trip). In addition, this alternative would not provide the benefit of providing additional parking spaces on the project site, as would be provided by the proposed project.

The additional units provided by this alternative would be created dividing 20 existing units into 40 smaller units. These newly created units would be substantially smaller than the units that would be provided by the proposed project. It is not known what the market demand would be for the small units created by this alternative, but it is possible that the new units would be less desirable than the larger units that would remain on the campus. Due to the small increase in traffic volumes that would result from the implementation of this alternative, the continuation of existing parking conditions, and possible implementation feasibility issues, this alternative is not considered to be the environmentally superior alternative.

The objective of the "Eliminate the Proposed Driveway Connection to Torino Drive" alternative was to minimize impacts to biological resources that would occur on the Rutherford parcel. However, the analysis of this alternative concluded that its impacts to oak trees would generally be similar to the impacts of the proposed project, and the alternative would remove more non-native grassland than would be removed by the proposed project. This alternative would also require more on-site grading and the use of retaining walls than the proposed project, although, these impacts could likely be

reduced to a less than significant level. This alternative would generally implement the primary and other objectives of the proposed project, but would result in a slight increase in environmental impacts. Therefore, this alternative would not be environmentally superior to the proposed project.

The objective of the "Reduced Fuel Management Zone Width" Alternative is to minimize impacts to oak woodland and coastal sage scrub habitat located along the project site's western border that would result from proposed fuel management activities. This alternative would reduce the width of the proposed fuel management area from 75 to 50 feet. The analysis of this alternative concluded that when compared to the impacts of the proposed project, the fuel management-related impacts to coastal sage scrub and oak woodland would be reduced but not avoided. In addition, this alternative would not avoid or minimize impacts to individual oak trees that are located on or adjacent to proposed building sites on the western portion of the project site. If approved by the Fire Marshal, this alternative would reduce potential wild fire impacts to a less than significant level, however, the overall fuel reduction benefits that may be provided by the proposed project would be somewhat reduced.

The objective of the "Relocate Proposed Residential Units on the Project Site" Alternative is to minimize the biological impacts of the proposed project, primarily to the resources located along the project site's western border. The analysis of this alternative concluded that when compared to the impacts of the proposed project, the impacts to biological resources would be reduced. In addition, fewer oak trees would be removed or impacted, and oak woodland and coastal sage habitat impacts due to project-related fuel management activities would be substantially reduced when compared to the impacts of the proposed project. Therefore, this alternative would provide a more substantial reduction in impacts to biological resources than would be provided by the "Reduced Fuel Management Zone Width" Alternative.

This alternative would implement the primary objectives of the project to enhance existing campus facilities and to provide additional senior housing. This alternative would be somewhat inconsistent with the objective related to preserving outdoor areas on the previously developed portions of the Valle Verde campus, however, CEQA does not require alternatives to fully achieve each of the proposed project's objectives. Therefore, the "Relocate Proposed Residential Units on the Project Site" Alternative would be the alternative, other than the "No Project – No Development" alternative, that is environmentally superior to the proposed project.

Table 9.7-1
Project Alternative Summary

Alternative	Aesthetics	Biology	Traffic	Other Issue Areas	Project Objectives/ Feasibility
No Project – No Development	The significant but mitigable aesthetic impacts of the proposed project would be avoided.	The significant but mitigable impacts of the proposed project on biological resources would be avoided.	The less than significant traffic impacts of the proposed project would be avoided.	The significant but mitigable impacts of the proposed project would be avoided.	Objectives related to enhancing existing facilities and providing additional senior housing would not be met.
No Project – Existing CUP Buildout	Significant but mitigable aesthetic impacts of the proposed project would be avoided.	The significant but mitigable impacts of the proposed project on biological resources would be avoided.	The less than significant traffic impacts of the proposed project would be slightly increased but would remain less than significant.	Most of the significant but mitigable impacts of the proposed project would be avoided. Short-term solid waste impacts would be similar to the impacts of the proposed project.	Objectives related to enhancing existing facilities would not be met. The residential units created by this alternative would be smaller than existing and proposed units, which may adversely affect the desirability of the units.
Eliminate the Proposed Driveway Connection to Torino Drive	Aesthetic impacts would be increased when compared to the impacts of the proposed project, but would remain less than significant or could be reduced to a les than significant level.	Biology impacts would be increased when compared to the impacts of the proposed project, but would remain less than significant.	Traffic impacts would be the same as the less than significant impacts of the proposed project.	Impacts would be increased when compared to the impacts of the proposed project, but would remain less than significant.	This alternative would generally satisfy the objectives of the proposed project.
Relocate Proposed Residential Units on the Project Site	Aesthetic impacts would be reduced when compared to the impacts of the proposed project.	Biology impacts would be substantially reduced when compared to the impacts of the proposed project.	Traffic impacts would be the same as the less than significant impacts of the proposed project.	Impacts would be reduced when compared to the impacts of the proposed project.	This alternative may be inconsistent with the objective to retain outdoor space on the project site, but would fulfill other project objectives.

Alternative	Aesthetics	Biology	Traffic	Other Issue Areas	Project Objectives/ Feasibility
Reduced Fuel Management Zone Width	Less than significant project-related impacts resulting from fuel management activities on the western edge of the project site would be slightly reduced by this alternative.	Biology impacts would be slightly reduced when compared to the impacts of the proposed project.	Traffic impacts would be the same as the less than significant impacts of the proposed project.	Wildfire-related impacts of this alternative would be similar to the impacts of the proposed project. However, fuel reduction benefits of the proposed project, which would occur in an area bordered by urban development, would be somewhat reduced.	This alternative would generally satisfy the objectives of the proposed project.